

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	) Chapter 11
	)
Squirrels Research Labs LLC, <i>et al.</i> <sup>1</sup>	) Case No. 21-61491
	) ( <i>Request for Joint Administration Pending</i> )
Debtors.	)
	) Judge Russ Kendig

**MOTION FOR ADMISSION OF JEANNIE KIM *PRO HAC VICE***

John C. Cannizzaro, an attorney at the law firm of Ice Miller LLP, a member in good standing of the bar of this Court and co-counsel for Instantiation LLC (“Instantiation”) in connection with the chapter 11 case of the above-captioned debtors and debtors-in-possession (the “Debtor”), hereby moves this Court, pursuant to Local Bankruptcy Rule 2090-1 and the Certification of Jeannie Kim attached hereto and incorporated herein by reference (the “Certification”), for the entry of an Order admitting Ms. Kim *pro hac vice* to appear before the Court in the Debtor’s chapter 11 case. As is set forth in the Certification:

1. Ms. Kim is an attorney at Sheppard, Mullin, Richter & Hampton LLP, which is located at Four Embarcadero Center, Seventeenth Floor, San Francisco, CA 94111.
2. Ms. Kim is admitted and in good standing with the bar of the state of California, the United States District Courts for the Northern, Southern, Eastern, and Central Districts of California, and the Ninth Circuit Court of Appeals and has never been suspended, disbarred, or otherwise disciplined in any jurisdiction.
3. Ms. Kim submits to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

Wherefore, Instantiation respectfully requests that the Court enter an order authorizing Ms. Kim to appear *pro hac vice* in this chapter 11 case.

Dated: November 24, 2021

Respectfully submitted,

/s/ John C. Cannizzaro

John C. Cannizzaro (0085161)

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Debtors.	)	
	)	Judge Russ Kendig

**CERTIFICATION OF JEANNIE KIM**

I, Jeannie Kim, under penalty of perjury, do hereby certify that (1) I am an attorney at Sheppard, Mullin, Richter & Hampton LLP, which is located at Four Embarcadero Center, Seventeenth Floor, San Francisco, CA 94111; (2) I am admitted and in good standing with the bar of the state of California, the United States District Courts for the Northern, Southern, Eastern, and Central Districts of California, and the Ninth Circuit Court of Appeals and have never been suspended, disbarred, or otherwise disciplined in any jurisdiction; and (3) I submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the preparation or course of this action.

Dated: November 23, 2021

/s/ Jeannie Kim

Jeannie Kim (*pro hac vice* pending)

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2021, the foregoing and the attachments thereto were filed electronically with the Clerk using the Court's CM/ECF system, which sent notification of such filing to all counsel of record.

Dated: November 24, 2021

Respectfully submitted,

/s/ John C. Cannizzaro

John C. Cannizzaro (0085161)

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